

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,

v.

Ignacio DOMINGUEZ-Felix  
Defendant.

Magistrate Case No.:


08 MJ 84 12

COMPLAINT FOR VIOLATION OF  
21 U.S.C. § 952 and 960  
Importation of a Controlled Substance  
Felony)

The undersigned complainant being duly sworn states:

That on or about May 11, 2008, within the Southern District of California, defendant Ignacio DOMINGUEZ-Felix, did knowingly and intentionally import approximately 8.18 kilograms (17.996 pounds) of methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

  
Mario Vazquez, Special Agent  
U.S. Immigration and  
Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE THIS 13th  
DAY OF MAY 2008.

  
PETER C. LEWIS  
U.S. MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA

2 v.

3 Ignacio DOMINGUEZ-Felix

4 STATEMENT OF FACTS

5 This statement of facts is based on the reports, documents, and notes furnished  
6 to US Immigration and Customs Enforcement Special Agent Mario Vazquez.

7 On May 11, 2008, at approximately 1630 hours, Ignacio DOMINGUEZ-Felix  
8 entered the United States at the Calexico, California, West Port of Entry. DOMINGUEZ  
9 was the driver and registered owner of a 1998 Jeep Grand Cherokee, bearing Baja  
10 California, Mexico license plate AJA1196.

11 The primary inspector, Customs and Border Protection Officer (CBPO) Ash  
12 received a negative Customs declaration from DOMINGUEZ. DOMINGUEZ stated that  
13 he was in route to the Calexico area to do some shopping. During a cursory inspection  
14 CBPO Ash noticed a tow bar in the rear cargo area. DOMINGUEZ stated that he was  
15 going to pick up a vehicle for export to Mexico. DOMINGUEZ and the vehicle were  
16 referred to secondary inspection to pay a users fee for the tow bar.

17 In the vehicle secondary lot, a canine inspection of the vehicle was performed.  
18 The canine alerted and responded to the bottom of the vehicle DOMINGUEZ was  
19 driving.

20 A subsequent inspection of the vehicle revealed 23 packages concealed in  
21 specially built compartments within the transfer case and front differential of the vehicle.  
22 CBPO Garcia probed one of the packages which revealed a white powdery substance  
23 that field-tested positive for methamphetamine. The 23 packages had a combined net  
24 weight of approximately 8.18 kilograms (17.996 pounds).